

APPENDIX A

Exhibit No.	Description	Basis for Sealing
1	Excerpts from the Expert Report of Robin S. Lee on behalf of Plaintiffs in this case, dated December 22, 2023	<p>Google has filed Exhibit 1 under seal pursuant to Plaintiffs' designation as highly confidential.</p> <p>Google does not take a position on whether all of Exhibit 1 should remain under seal. However, Google requests, as denoted by the blue highlighting, limited redactions of certain non-public financial information; detailed charts containing market share analyses and calculations based either entirely or in part on Google's internal, non-public proprietary data; and other analyses based on Google's non-public proprietary data. Google's proposed redactions are narrowly targeted and would still allow the public to understand Exhibit 1's meaning.</p>
2	Excerpts from the Expert Report of Rosa M. Abrantes-Metz on behalf of Plaintiffs in this case, dated December 22, 2023	Google has filed Exhibit 2 under seal pursuant to Plaintiffs' designation as highly confidential.
3	Excerpts from the Expert Rebuttal Report of Robin S. Lee on behalf of Plaintiffs in this case, dated February 13, 2024	<p>Google has filed Exhibit 3 under seal pursuant to Plaintiffs' designation as highly confidential.</p> <p>Google does not take a position on whether all of Exhibit 3 should remain under seal. However, Google requests, as denoted by the blue highlighting, limited redactions of certain detailed charts containing market share analyses and other calculations based either entirely or in part on Google's internal, non-public proprietary data. Google's proposed redactions are narrowly targeted and would still allow the public to understand Exhibit 3's meaning.</p>

Exhibit No.	Description	Basis for Sealing
4	Excerpts from the Expert Report of Gabriel Weintraub on behalf of Plaintiffs in this case, dated December 22, 2023	Google has filed Exhibit 4 under seal pursuant to Plaintiffs' designation as highly confidential.
5	Excerpts from the Expert Report of Timothy Simcoe on behalf of Plaintiffs in this case, dated December 22, 2023	<p>Google has filed Exhibit 5 under seal pursuant to Plaintiffs' designation as highly confidential.</p> <p>Google does not take a position on whether all of Exhibit 5 should remain under seal. However, Google requests, as denoted by blue highlighting, limited redactions of discussion of non-public competitively sensitive customer contract terms as well as analyses based on Google's non-public proprietary data. Google's proposed redactions are narrowly targeted and would still allow the public to understand Exhibit 5's meaning.</p>
7	Excerpts from the transcript of the deposition of Kenneth Wilbur, expert witness on behalf of Plaintiffs in this case, taken on March 1, 2024	Google has filed Exhibit 7 partially under seal due to discussion of a third-party's deposition testimony designated as confidential.
8	Excerpts from the transcript of the deposition of Robin Lee, expert witness on behalf of Plaintiffs in this case, taken on March 15, 2024	<p>Google has filed Exhibit 8 under seal pursuant to its designation as Highly Confidential under paragraph 7(b) of the Modified Protective Order.</p> <p>Google does not take a position on whether all of Exhibit 8 should remain under seal. However, Google requests, as denoted by blue highlighting, limited redactions pertaining to discussion of market share analyses and calculations based on Google's internal, non-public proprietary data, as well as confidential revenue information. Google's proposed redactions are narrowly targeted and would still allow the public to understand Exhibit 8's meaning.</p>

Exhibit No.	Description	Basis for Sealing
9	Excerpts from the transcript of the deposition of Benneaser John in his capacity as a corporate representative of Microsoft pursuant to Federal Rule of Civil Procedure 30(b)(6), taken on September 8, 2023	Google has filed Exhibit 9 under seal pursuant to third-party Microsoft's designation as highly confidential.
10	Excerpts from the transcript of the deposition of John Dederick in his capacity as a corporate representative of The Trade Desk pursuant to Federal Rule of Civil Procedure 30(b)(6), taken on July 28, 2023	Google has filed Exhibit 10 under seal pursuant to third-party Trade Desk's designation as highly confidential.
11	Excerpts from the transcript of the deposition of Luke Lambert in his capacity as a corporate representative of Omnicom pursuant to Federal Rule of Civil Procedure 30(b)(6), taken on August 29, 2023	Google has filed Exhibit 11 under seal pursuant to third-party Omnicom's designation as highly confidential.
13	Excerpts from the transcript of the deposition of Kristy Kozlowski in her capacity as a corporate representative of Comcast pursuant to Federal Rule of Civil Procedure 30(b)(6), taken on September 6, 2023	Google has filed Exhibit 13 under seal pursuant to third-party Comcast's designation as highly confidential.
14	Email correspondence from E. Stoltz to R. Herrera, et al., with subject line "[EXTERNAL] SPM Paid Media Plan," with attachment, dated June 16, 2021, produced by the DOJ on behalf of the VA in this matter, and bearing Bates No. VET-AF-ADS-0000122732 to VET-AF-ADS-0000122747	Google has filed Exhibit 14 under seal pursuant to Plaintiffs' designation as highly confidential.
24	A diagram of the Microsoft Advertising Ecosystem, which was used as Exhibit 24 in the deposition of Benneaser John in his capacity as a corporate representative of Microsoft pursuant to Federal Rule of Civil Procedure 30(b)(6), taken on September 8, 2023	Google has filed Exhibit 24 under seal pursuant to third-party Microsoft's designation as highly confidential.

Exhibit No.	Description	Basis for Sealing
25	Excerpts from the transcript of the deposition of Todd Parsons in his capacity as a corporate representative of Criteo pursuant to Federal Rule of Civil Procedure 30(b)(6), taken on September 8, 2023	Google has filed Exhibit 25 under seal pursuant to third-party Criteo's designation as highly confidential.
28	Excerpts from the Expert Report of Ramamoorthi Ravi on behalf of Plaintiffs in this case, dated December 22, 2023	Google has filed Exhibit 28 under seal pursuant to Plaintiffs' designation as highly confidential. Google does not take a position on whether all of Exhibit 28 should remain under seal. However, Google requests, as denoted by blue highlighting, limited redactions pertaining to discussion of certain confidential technical and product information as well as pricing information. Google's proposed redactions are narrowly targeted and would still allow the public to understand Exhibit 28's meaning.
29	Excerpts from a presentation titled "DSP Investment Strategy," dated May 20, 2019, produced by AT&T in this matter, bearing Bates No. ATT-GCID-00111192 to ATT-GCID-00111288	Google has filed Exhibit 29 under seal pursuant to third-party Microsoft's designation as confidential.
32	Excerpts from the transcript of the deposition of Ramamoorthi Ravi, expert witness on behalf of Plaintiffs in this case, taken February 20, 2024	Google has filed Exhibit 32 partially under seal as it contains discussion of a third-party's deposition testimony designated as highly confidential.

Exhibit No.	Description	Basis for Sealing
33	Excerpts from the Expert Report of Mark A. Israel on behalf of Google in this case, dated January 23, 2024	Google has filed Exhibit 33 partially under seal for two reasons. First, as denoted in yellow highlighting, Exhibit 33 contains material designated highly confidential by Plaintiffs. Second, as denoted by blue highlighting, Google requests limited redactions pertaining to discussion of certain product policy and technical specifications. Google's proposed redactions are narrowly targeted and would still allow the public to understand Exhibit 33's meaning.
34	Excerpts from a presentation titled "Board Meeting," dated January 29, 2019, produced by PubMatic in this matter, and bearing Bates No. PUBMATIC_DOJ-00000132 to PUBMATIC_DOJ-00000203	Google has filed Exhibit 34 under seal pursuant to third-party Pubmatic's designation as highly confidential.
35	Excerpts from a presentation titled "Neil-OpenX Discussion," dated 2018, produced by OpenX in this matter, and bearing Bates No. OPENX-00001018 to OPENX-00001049	Google has filed Exhibit 35 under seal pursuant to third-party Open X's designation as highly confidential.
36	Printout of an Excel spreadsheet showing Sovrn exchange revenue, dated Q1 2015 to Q4 2022, produced by Sovrn in this matter, and bearing Bates No. SVRN000076	Google has filed Exhibit 36 under seal pursuant to third-party Sovrn's designation as confidential.
38	Excerpts from the Expert Report of Judith A. Chevalier on behalf of Google in this case, dated January 23, 2024	Google has filed Exhibit 38 partially under seal because it contains material designated confidential by Plaintiffs.
44	Excerpts from the Expert Rebuttal Report of Rosa M. Abrantes-Metz on behalf of Plaintiffs in this case, dated February 13, 2024	Google has filed Exhibit 44 under seal pursuant to Plaintiffs' designation as highly confidential.

Exhibit No.	Description	Basis for Sealing
46	Document titled “AWBid 2021 Strategy Paper,” dated Aug 3, 2020, produced by Google in this matter, and bearing Bates No. GOOG-DOJ-AT-02307442 to GOOG-DOJ-AT-02307446	Google has filed Exhibit 46 partially under seal because Google requests limited redactions pertaining to discussion of non-public financial, pricing, and technical information relating to Google’s AwBid product program. Google’s proposed redactions are narrowly targeted and would still allow the public to understand Exhibit 46’s meaning.
51	Excerpts from the transcript of the deposition of James Glogovsky in his capacity as a corporate representative of <i>The New York Times</i> pursuant to Federal Rule of Civil Procedure 30(b)(6), taken on August 25, 2023	Google has filed Exhibit 51 under seal pursuant to third-party New York Times’ designation as highly confidential.
62	Excerpts from the Expert Rebuttal Report of Adoria Lim on behalf of Plaintiffs in this case, dated February 13, 2024	<p>Google has filed Exhibit 62 under seal pursuant to Plaintiffs’ designation as highly confidential.</p> <p>Google does not take a position on whether all of Exhibit 62 should remain under seal. However, as denoted by blue highlighting, Google requests limited redactions pertaining to discussion of Google’s confidential and competitively sensitive financial information, including profit and loss statements. Google also requests limited redactions pertaining to certain other confidential financial information, such as non-public revenue numbers. Google’s proposed redactions are narrowly targeted and would still allow the public to understand Exhibit 62’s meaning.</p>
66	Excerpts from the transcript of the deposition of Christopher Koepke in his capacity as a corporate representative of CMS pursuant to Federal Rule of Civil Procedure 30(b)(6), taken on August 25, 2023	Google has filed Exhibit 66 partially under seal pursuant to Plaintiffs’ designation as confidential, which is denoted by yellow highlighting.

Exhibit No.	Description	Basis for Sealing
67	Email correspondence from S. Edlavitch to E. Blazar, et al., with subject line “Re: OE8 Campaign results,” dated January 28, 2021, produced by the DOJ on behalf of CMS in this matter, and bearing Bates No. CMS-ADS-0000373744 to CMS-ADS-0000373745	Google has filed Exhibit 67 under seal pursuant to Plaintiffs’ designation as highly confidential.
68	Excerpts from the transcript of the deposition of Adoria Lim, expert witness on behalf of Plaintiffs in this case, taken on February 29, 2024	<p>Google has filed Exhibit 68 partially under seal, in part, because it contains discussion of Google’s highly sensitive and confidential financials and profits, which is denoted by blue highlighting. Google requests limited redactions pertaining to this confidential and competitively sensitive financial information. Google’s proposed redactions are narrowly targeted and would still allow the public to understand Exhibit 68’s meaning.</p> <p>Google has also filed Exhibit 68 partially under seal due to discussion of third-party confidential information, which is denoted by yellow highlighting.</p>
69	Excerpts from a document titled “Integrated Communications Contract: Revised Technical Proposal – Media Planning and Buying,” dated October 5, 2018, produced by the DOJ in this matter on behalf of the U.S. Census Bureau, and bearing Bates No. CENSUS-ADS-0000387420 to CENSUS-ADS-0000387490	Google has filed Exhibit 69 under seal pursuant to Plaintiffs’ designation as highly confidential.

Exhibit No.	Description	Basis for Sealing
70	Excerpts from email correspondence from G. Mason to S. McMeen, et al., with subject line “Media Overview Slides,” with attachment, dated June 25, 2019, produced by the DOJ on behalf of NHTSA in this matter, and bearing Bates No. NHTSA-ADS-0000337070 to NHTSA-ADS-0000337119	Google has filed Exhibit 70 under seal pursuant to Plaintiffs’ designation as highly confidential.
71	Excerpts from email correspondence from S. Chang to C. Karpenko, et al., with subject line “RE: UM Contract,” with attachments, dated January 17, 2023, produced by the DOJ on behalf of USPS in this matter, and bearing Bates No. USPS-ADS-0000902290 to USPS-ADS-0000902373	Google has filed Exhibit 71 under seal pursuant to Plaintiffs’ designation as highly confidential.
72	Excerpts from a document titled “Solicitation/Contract/Order for Commercial Items,” dated September 10, 2021, produced by the DOJ on behalf of the VA in this matter, and bearing Bates No. VET-AF-ADS-0000461239 to VET-AF-ADS-0000461287	Google has filed Exhibit 72 under seal pursuant to Plaintiffs’ designation as highly confidential.
73	Excerpts from a document titled “Solicitation/Contract/Order for Commercial Items,” dated May 20, 2021, produced by the DOJ in this matter on behalf of the U.S. Navy, and bearing Bates No. NAVY-ADS-0000256935 to NAVY-ADS-0000257031	Google has filed Exhibit 73 under seal pursuant to Plaintiffs’ designation as highly confidential.

Exhibit No.	Description	Basis for Sealing
74	Email correspondence from K. Housein to P. Jenkins, et al., regarding task order award, with attachments, dated June 14, 2022, produced by the DOJ on behalf of CMS in this matter, and bearing Bates No. CMS-ADS-0000018746 to CMS-ADS-0000018790	Google has filed Exhibit 74 under seal pursuant to Plaintiffs' designation as highly confidential.
75	Excerpts from email correspondence from N. Rudyk to B. Dickey, et al., regarding media plan recommendation, with attachment, dated September 18, 2022, produced by the DOJ on behalf of the U.S. Air Force in this matter, and bearing Bates No. USAF-ADS-0000001422 to USAF-ADS-0000001476	Google has filed Exhibit 75 under seal pursuant to Plaintiffs' designation as confidential.
76	Excerpts from email correspondence from S. McMeen to J. Vallese, et al., regarding NHTSA request for proposal and task orders, with attachments, dated October 20, 2022, produced by the DOJ on behalf of NHTSA in this matter, and bearing Bates No. NHTSA-ADS-0000344712 to NHTSA-ADS-0000344846	Google has filed Exhibit 76 under seal pursuant to Plaintiffs' designation as confidential.
77	Email correspondence from N. Broler to L. Morris, et al., with subject line "[Non-DoD Source] Re: Revised Optimization Process Review," with attachment, dated April 8, 2022, produced by the Department of Justice ("DOJ") on behalf of the U.S. Army in this matter, and bearing Bates No. ARMY-ADS-0000060557 to ARMY-ADS-0000060559	Google has filed Exhibit 77 under seal pursuant to Plaintiffs' designation as confidential.

Exhibit No.	Description	Basis for Sealing
78	Excerpts from a document titled “Order for Supplies or Services,” dated November 21, 2018, produced by the DOJ in this matter on behalf of the U.S. Census Bureau, and bearing Bates No. CENSUS-ADS-0000075450 to CENSUS-ADS-0000075493	Google has filed Exhibit 78 under seal pursuant to Plaintiffs’ designation as highly confidential.
82	Document titled "Google Marketing Platform Order Form – Advertising Services," dated January 30, 2013, produced by Google in this matter, and bearing Bates No. GOOG-AT-MDL-019566844 to GOOG-AT-MDL-019566850	Google has filed Exhibit 82 partially under seal because it contains detailed information about Google’s non-public customer pricing and contractual terms. Google requests limited redactions of this competitively sensitive and proprietary information pertaining to contractual terms. Google’s proposed redactions are narrowly targeted and would still allow the public to understand Exhibit 82’s meaning.
87	Excerpts from a presentation titled “Future of Advertising,” dated July 2020, produced by Microsoft in this matter, and bearing Bates No. MSFT-LIT-0000000137	Google has filed Exhibit 87 under seal pursuant to third-party Microsoft’s designation as confidential.
88	Excerpt from a report on a 2022 ad campaign on behalf of the National Highway Traffic Safety Administration (“NHTSA”), which was used as Exhibit 143 in the deposition of Susan McMeen in her capacity as a corporate representative of NHTSA pursuant to Federal Rule of Civil Procedure 30(b)(6), taken on September 26, 2023	Google has filed Exhibit 88 completely under seal pursuant to Plaintiffs' designation as highly confidential.
89	Excerpts from a presentation titled “SSP Business Investment Case,” dated November 2019, produced by AT&T in this matter, and bearing Bates No. ATT-GCID-00111234 to ATT-GCID-00111288	Google has filed Exhibit 89 under seal pursuant to third-party AT&T’s designation as confidential.

Exhibit No.	Description	Basis for Sealing
90	Document titled "PStaff Meeting – 5/29/2018: DVIP 2019 and beyond," dated May 29, 2018, produced by Google in this matter, and bearing Bates No. GOOG-DOJ-03331721 to GOOG-DOJ-03331727	Google has filed Exhibit 90 partially under seal because it contains confidential financial information, including revenue, related to a discount program. Google requests limited redactions of this competitively sensitive information. Google's proposed redactions are narrowly targeted and would still allow the public to understand Exhibit 90's meaning.
92	Errata to the Expert Report of Timothy Simcoe, dated January 13, 2024	Google has filed Exhibit 92 under seal pursuant to Plaintiffs' designation as highly confidential.
93	Excerpts from the Expert Rebuttal Report of Timothy Simcoe on behalf of Plaintiffs in this case, dated February 13, 2024	Google has filed Exhibit 93 under seal pursuant to Plaintiffs' designation as highly confidential.
95	Excerpts from a document titled "2020 Census Integrated Communications Plan," dated June 2, 2017, produced by the DOJ in this matter on behalf of the U.S. Census Bureau, and bearing Bates No. CENSUS-ADS-0000029308 to CENSUS-ADS-0000029521	Google has filed Exhibit 95 under seal pursuant to Plaintiffs' designation as highly confidential.
97	Backup data for Figure 11 of Appendix E of the Expert Rebuttal Report of Adoria Lim	Google has filed Exhibit 97 under seal pursuant to Plaintiffs' designation as highly confidential.
99	Excerpts from a document titled "Digital Media Bill," dated November 21, 2022, produced by the DOJ in this matter on behalf of the U.S. Navy, and bearing Bates No. NAVY-ADS-0000373978 to NAVY-ADS-0000374145	Google has filed Exhibit 99 under seal pursuant to Plaintiffs' designation as highly confidential.